



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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July 14, 2014

Mr. David Libman
National Park Service
Southeast Regional Office
Planning and Compliance Division
100 Alabama St., 1924 BLDG
Atlanta, GA 30303

SUBJECT: General Management Plan Final Environmental Impact Statement
Fort Matanzas National Monument St. Augustine, Florida
CEQ #: 20140168

Dear Mr. Libman:

The U.S. Environmental Protection Agency (EPA) has reviewed the General Management Plan (GMP) Final Environmental Impact Statement (FEIS) Fort Matanzas National Monument (NM), St. Augustine, Florida in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The purpose of the FEIS is to provide a comprehensive management plan that helps the National Park Service (NPS) fulfill the national monument purpose, maintain its significance, and protect its resources for present and future generations.

Proposed Action: the GMP will provide guidance for the next 20 plus years on perpetuating natural systems, preserving cultural resources, and providing a quality visitor-experience opportunity for this NM. Any proposed development consistent with the proposed action would require feasibility studies, detailed planning, and environmental documentation. GMP implementation is dependent upon available resources and consequently may occur in phases over many years.

Description: Fort Matanzas consists of nearly 300 acres on Rattlesnake and Anastasia Islands, three historic structures: the Fort, Visitor Center, HQ administrative buildings, and the Johnson House, and the Matanzas Ramp: the Atlantic Ocean beach access road. The NM is located 14 miles south of the City of St. Augustine, Florida.

Purpose & Need: The GMP's purpose is to decide how the NPS can best fulfill the NM's purpose, maintain its significance, and protect its resources unimpaired for the enjoyment of present and future generations. This action is needed to update the outdated 1982 Fort Matanzas

GMP as both the National Parks and Recreation Act and NPS policy mandate development of a GMP for each park.

Alternatives: The DEIS indicates five issues helped to steer the development of preliminary alternatives. The visitor center space inadequacy, the recent closure of the beach to driving off designated roads, the insufficient visitor parking, visitor concern over the natural environment's health, and the challenge of partnering with the neighboring state parks and forests, conservation areas, and preserves were the identified five issues.

The DEIS discusses three alternatives: the no action alternative (A), NPS-preferred/the environmentally preferred alternative (B), and alternative C. The major differences between the three alternatives appear to center on three issues: the visitor center, parking space, and degree of cultural and natural resource interpretation opportunities.

EPA Comments:

- EPA suggests the NPS consider "climate change," likely a common concern to all entities mentioned, as a partnering opportunity for collaboration. For example, developing a partnership to share in the following activities:
 - monitor changes and associated impacts to define climate change related cause and effect relationships,
 - identify ecosystem services provided by all entities, e.g., flooding protection during severe events and the potential for being a CO₂ sink to facilitate the climate change adaption and mitigation at the regional level, and
 - research of potential climate change adaptation and mitigation strategies that could be used by all coastal entities in the southeast.

EPA finds the one issue having the most potential to significantly impact the NM during the GMP's project life is the issue of increasingly diminished opportunities for the public to access the beaches, which is increasing parking pressures and collateral impacts upon the NM resource.

The FEIS states the resulting extra parking spaces would be beneficial to traffic circulation; however, parking would likely continue to be an issue for the park without significant increase in parking opportunities. Also the FEIS states Public access to the beach is a growing problem in the area with the increase in condominiums; the public access areas have been diminished.

EPA recommends the GMP include indicators to measure parking pressures upon the NM associated with declining public beach access associated with development.

EPA recommends the GMP discuss how the NPS mission is impacted if it is the default option to providing public beach access to replace the access reduced by private development.

EPA recommends the cumulative effects discussion be expanded to fully discuss the potential parking needs associated with loss of formerly public beach access and its associated

impacts to the GMP's purpose: to decide how NPS can best maintain the NM's significance and protect its resources unimpaired for the enjoyment of present and future generations.

In the spirit of collaboration and technical assistance the EPA recommends some sustainability concepts which could be considered in the final management plan.

Green Building

Green building is the practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building's life-cycle from design to, construction, operation, maintenance, renovation and deconstruction. This practice expands and complements the classical building design concerns of economy, utility, durability, and comfort. Green buildings are known as a sustainable or high performance buildings.

Green buildings are designed to reduce the overall impact of the built environment on human health and the natural environment by:

- Efficiently using energy, water, and other resources
- Protecting occupant health and improving employee productivity
- Reducing waste, pollution and environmental degradation

For example, green buildings may incorporate sustainable materials in their construction (e.g., reused, recycled-content, or made from renewable resources); create healthy indoor environments with minimal pollutants (e.g., reduced product emissions); and/or feature landscaping that reduces water usage (e.g., by using native plants that survive without extra watering).

In the United States, buildings account for:

- 39 percent of total energy use
- 12 percent of the total water consumption
- 68 percent of total electricity consumption
- 38 percent of the carbon dioxide emissions

Potential benefits of green building can include:

Environmental benefits

- Enhance and protect biodiversity and ecosystems
- Improve air and water quality
- Reduce waste streams
- Conserve and restore natural resources

Economic benefits

- Reduce operating costs
- Create, expand, and shape markets for green product and services
- Improve occupant productivity
- Optimize life-cycle economic performance

Social benefits

Enhance occupant comfort and health
Heighten aesthetic qualities
Minimize strain on local infrastructure

Green Parking

Green parking refers to several techniques that when applied together reduce the contribution of parking lots to total impervious cover. From a storm water perspective, green parking techniques applied in the right combination can dramatically reduce impervious cover and, consequently, reduce the amount of storm water runoff. Green parking lot techniques include: setting minimums of permanent parking spaces; minimizing the dimensions of parking lot spaces; utilizing alternative pavers in overflow parking areas; using bioretention areas to treat storm water; encouraging shared parking.

Green parking lots can dramatically reduce the creation of new impervious cover. How much is reduced depends on the combination of techniques used to achieve the greenest parking. While the pollutant removal rates of bioretention areas have not been directly measured, their capability is considered comparable to a dry swale, which removes 91 percent of total suspended solids, 67 percent of total phosphorous, 92 percent of total nitrogen, and 80-90 percent of metals (Claytor and Schueler, 1996).

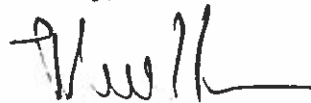
North Carolina's Fort Bragg vehicle maintenance facility parking lot is an excellent example of the benefits of rethinking parking lot design (NRDC, 1999). The redesign incorporated storm water management features, such as detention basins located within grassed islands, and an onsite drainage system that exploited existing sandy soils. The redesign reduced impervious cover by 40 percent, increased parking by 20 percent, and saved 20 percent or \$1.6 million on construction costs over the original, conventional design.

Briefly three other sustainable activities which may be applicable to the Park Service's general management plan are as follows:

- **Green Detention Ponds**
- **Rain Water Harvesting**
- **Rain Gardens**

We appreciate the opportunity to review the proposed action. EPA agrees that alternative (B) NPS-preferred/the environmentally preferred appears to be the best alternative. Please contact Ken Clark at (404) 562-8282 if you have any questions or want to discuss our comments.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
EPA Region 4